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ATTORNEY FOR DEFENDANT
Shalom Ifrah

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF
CALIFORNIA**

UNITED STATES OF AMERICA,) CASE NO. 2:22-cr-00046-WBS
)
Plaintiff,) STIPULATION TO ALLOW
) DEFENDANT IFRAH TO TRAVEL
) TO AND FROM TEL AVIV ISRAEL
) DECLARATION OF DAVID E.
vs.) KENNER: ATTACHMENTS A AND B
)
) [PROPOSED] ORDER LODGED
SHALOM, IFRAH ET AL.,) HEREWITH
Defendants.)
_____)

IT IS HEREBY STIPULATED by and between Phillip Talbert, United States Attorney, through Roger Yang, Assistant United States Attorney, attorney for Plaintiff, and David E. Kenner, attorney for defendant Shalom Ifrah that the defendant may travel to and from Tel Aviv Israel, on July 9, 2024, and returning on July 22, 2024. It is further ordered that Mr. Ifrah can pick-up his US Passport from Pre-trial Services within 48 hours of his departure and return it to them within 24 hours of his return.

This request is supplemented by the declaration of undersigned counsel, Exhibits A and B and all the files and records in this case.

1 **IT IS SO STIPULATED**

2 Respectfully submitted,

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4
5 Dated: July 8, 2024

/s/_____
6 DAVID E. KENNER
7 For Defendant
8 SHALOM IFRAH
9

10 Dated: July 8, 2024

/s/_____
11 ROGER YANG
12 Assistant United States Attorney
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UNITED STATES OF AMERICA,)	CASE NO. 2:22-cr-00046-WBS
)	
Plaintiff,)	
)	[PROPOSED] ORDER
)	
vs.)	
)	
)	
SHALOM, IFRAH ET AL.,)	
Defendants.)	
_____)	

IT IS HEREBY ORDERED THAT Shalom Ifrah, the defendant, may travel to and from Tel Aviv Israel, on July 9, 2024, and returning on July 22, 2024. It is further ordered that Mr. Ifrah can pick-up his US Passport from Pre-trial Services within 48 hours of his departure and return it to them within 24 hours of his return.

IT IS SO ORDERED.

Dated: July 8, 2024



JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE

DECLARATION OF DAVID KENNER

David E. Kenner declares:

1. I am the attorney of record for the herein defendant, Shalom Ifrah.
2. Attached as Exhibit A is a true and correct copy of a receipt showing that, on July 9th, 2024, Mr. Ifrah purchased tickets for his trip from LAX to Tel Aviv Israel and back to LAX.
3. Attached as Exhibit B is a true and correct copy of an email from Shalom Ifrah to me Dated June 26th, 2024. That includes the dates of travel and the location where he will be staying in Tel Aviv (Sderot HaAtsma'ut 37 floor 5 apt #13. Bat Yam Israel: 5939524) The Phone number at that location is (+972528373603)
4. Attached As Exhibit C is a true and correct copy of an email dated June 17th, 2024, from Mr. Ifrah to me reflecting that the reason for his travel request is to attend the wedding of a childhood friend.
5. I have met and conferred with, AUSA Roger Yang and he has no objection to the court granting this request. Further, they do not oppose Mr. Ifrah' traveling without the location monitoring equipment. See Exhibit D true and correct copy of an email from AUSA Roger Yang to me received July 8th, 2024, stating the aforementioned.

I declare under penalty of perjury, according to the laws of the United States of America, that the foregoing is true and correct this 8th day of July 2024, at Encino, California.

_____/s/_____
David E. Kenner
Attorney at Law